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ABSTRACT

This document summarizes the ninth annual report of civil rights compliance activities in Michigan carried out by the Vocational-Technical Education Service (VTES), under the Michigan State Board of Education, during fiscal year 1988-89. These activities were conducted to comply with the mandates of the Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap. The staffs of the VTES, the Community College Services Unit-Higher Education Management Services, and an educational firm from Detroit were responsible for conducting the compliance program. A state-level policy and program review determined that all policies were in compliance with the guidelines. No amendments or rescissions of policies were needed. A combined desk audit/onsite review of the State Technical Institute and Rehabilitation Center was conducted. Agency desk audits of 20 percent of the state's total number of subrecipients that offered vocational education (n=424) were completed. Benchmarks were established to compare data pertaining to special populations or protected groups. Secondary and postsecondary data were analyzed. No clear and present violations were found. Twenty-five percent of the desk audits (n=28) were selected for on-site reviews. On-site reports were prepared summarizing the findings and recommendations for compliance, including compliance plan development. Inservice training and technical assistance were provided. Results of monitoring included tentative and final approval of compliance plans and closure of other plans. (YLB)

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CIVIL RIGHTS COMPLIANCE
IN
VOCATIONAL EDUCATION

1988-89 ANNUAL REPORT

Prepared for

The Michigan State Board of Education

JUNE 1989

U.S. DEPARTMENT OF EDUCATION
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PREFACE

This document summarizes the ninth annual report of Civil Rights Compliance Activities in Michigan for fiscal year 1988-89. It describes activities conducted to comply with the mandates of Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, [sic]* and Handicap, issued March 21, 1979. These Guidelines, which supplement Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973, require the Vocational-Technical Education Service, under the State Board of Education, to implement a compliance program to prevent, identify, and remedy discrimination by its subrecipients.

In compliance with the Guidelines and the approved "Methods of Administration"[1] document, the State agency must:

- Conduct a review of its vocational education policies and programs.

- Conduct an agency desk audit of a minimum of 20 percent of the State's total number of subrecipients that offer vocational education.

- Conduct on-site reviews of a minimum of 25 percent of the subrecipients that are desk audited.

- Provide technical assistance to aid subrecipients in identifying, preventing, and remedying discrimination.

- Report compliance activities and findings to the Office for Civil Rights.

Herein is a description of procedures, findings, and other activities relevant to the performance of these responsibilities. In accordance with the Michigan Department of Education's "Method's of Administration," and the reporting requirements as identified by

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[1] "Methods of Administration" document: Michigan's plan for performing oversight responsibilities, submitted to the U.S. Office of Education and the U.S. Office for Civil Rights, July 1980.

*A comma was added for greater clarity.

the July 1979 Memorandum of Procedures at Part 5, the following information is provided within the report:

I. Compliance Organization and Staff
II. State Policy Review
III. Review of State-Operated Institutions and Programs
IV. Subrecipients Receiving Agency-Level Reviews
V. Identification of Subrecipients for On-Site Reviews
VI. Technical Assistance Activities
VII. Subrecipients Referred to the Office for Civil Rights
VIII. Monitoring Activities

Activities described in this report have been conducted by staffs of the Vocational-Technical Education Service, the Community College Services Unit-Higher Education Management Service, and CRW Associates, Incorporated (an educational firm from Detroit contracted from 1985 until present to assist with the Office for Civil Rights' activities).

Reactions to the content of this document and/or any suggestions for the improvement of vocational education in general are invited and should be directed to Dr. Lola Jackson, State Director, Vocational-Technical Education Service, Post Office Box 30009, Lansing, Michigan 48909.

Prepared by

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EXECUTIVE SUMMARY

This report is based on the State of Michigan's Civil Rights Compliance Activities for the 1988-89 reporting year. These activities are in accordance with the Office for Civil Rights (OCR) Guidelines.

I. COMPLIANCE ORGANIZATION AND STAFF

The Vocational-Technical Education Service (V-TES) and Higher Education Management Services (HEMS) staffs are responsible for conducting the Civil Rights Compliance program. One full-time staff person of the Special Populations Programs and Services Unit of V-TES serves as consultant for the "Methods of Administration" (MOA) compliance activities, and one full-time secretary of V-TES works with the project also. Approximately 25 V-TES staff persons and 3 HEMS staff persons assist part time with the compliance program in conducting on-site reviews and providing technical assistance, when needed.

CRW Associates, Incorporated participates in most of the MOA activities including data analysis, planning and conducting of on-site reviews, and provision of technical assistance. CRW Associates' primary role is to obtain voluntary compliance plans and to monitor implementation of existing compliance plans for the MOA program. CRW Associates has six employees assigned to the project.

II. STATE POLICY REVIEW

A. Purpose

The State-Level Policy and Program Review was designed and conducted to increase the impact of vocational education by making sure that the policies and programs that originate at the State level do not manifest or perpetuate discrimination. The review provides an opportunity to examine the basic "rules and regulations" that establish and determine the course of vocational education in Michigan, and a sound basis upon which extension, modification, or deletion of these "rules and regulations" have been made.

B. Types of Policies Reviewed

"Section II A of the Guidelines prohibits State agency recipients from directly taking any action that leads to

discrimination on the basis of race, color, national origin, sex, [sic] and handicap. The four general areas to which this prohibition applies are: 1) the establishment of criteria or formulas for distribution of Federal or State funds to vocational education programs; 2) the establishment of requirements for admission to or requirements for the administration of vocational education programs; 3) the approval of action by local entities (subrecipients) providing vocational education; and 4) the conduct of their own programs."[2] These four areas constitute the basis for the State Policy Review.

C. Methodology

1. A thorough review of state-level policies and programs has been reported each of the past eight years, with the initial State-Level Policy and Program Review being conducted by the Office for Civil Rights--Methods of Administration Task Force. This continuing review was conducted by the Department's OCR Consultant in cooperation with the V-TES supervisors. The review consisted of the following activities:

   a. Analysis of the 1988-89/1989-90 Michigan State Plan for Vocational Education.

   b. Review of the 1989 Administrative Guide for Vocational-Technical Education in Michigan.

   c. Review of the Michigan State Board of Education's Adopted Affirmative Action Plan.

   d. Completion of Policy and Program Analysis Checklists by supervisors of the Planning, Evaluation and Finance Unit; the Program Development and Operation Unit; the Special Populations Programs and Services Unit; and the Vocational Guidance Unit.

2. The policies that govern all four areas of review were found to be in compliance with the Guidelines. In reference to 45 CFR, Part 80, Appendix B of the Guidelines:

   a. The Department's policies adhere to Sections III and IV for the establishment of criteria or formulas for distribution of Federal or State funds to vocational education programs.

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[2] "Memorandum of Procedures": Procedures for Preparing the Methods of Administration Described in the Vocational Education Programs Guidelines, submitted to the Michigan Department of Education, July 1979.

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b. The Department's policies adhere to Sections IV, V, VI, VII, and VIII for the establishment of requirements for the administration of vocational education programs.

c. The Department's policies adhere to Section VII for the approval of action by local entities providing vocational education.

d. The Department's policies adhere to Sections III, IV, V, VI, VII, and VIII for the conduct of its own programs.

D. Results of Review

Based on the review process, it was determined that all policies were in compliance with Sections III, IV, V, VI, VII, and VIII of the Guidelines. There was no need for amendments or recisions of policies.

III. REVIEW OF STATE-OPERATED INSTITUTIONS AND PROGRAMS

The State Technical Institute and Rehabilitation Center (STIRC) is the only state-operated institution that was eligible for review. STIRC is operated by the Michigan Rehabilitation Services/Department of Education. STIRC provides vocational training and comprehensive rehabilitation services necessary to equip handicapped citizens for employment and self-sufficiency.

STIRC was included in the 1988-89 review process according to the Department's agreement with the Regional Office for Civil Rights. Because of limited data available on the institution together with the nature of educational services provided by the institution, a combined desk audit/on-site review was conducted.

IV. SUBRECIPIENTS RECEIVING AGENCY-LEVEL REVIEWS

A. Methodology - Selection Process

In order to select 20 percent of the total pool of subrecipients for desk audits, the following measures were taken:

1. K-12 districts, area centers/consortia, and post-secondary institutions that were the subjects of complaints were added to the desk audit list.

2. K-12 districts, area centers/consortia, and post-secondary institutions that had been desk audited

during years one, two, and three of the second, five-year cycle were exempted from the desk audit process.

3. Twenty percent of the area centers/consortia were added to the list.

4. The feeder schools to the area centers/consortia were added to the list.

5. K-12 districts were randomly selected until a 20 percent quota was reached.

6. Twenty percent of the postsecondary institutions were added to the list.

In compliance with the official memorandum from the U.S. Department of Education (1979), 20 percent-plus of the total number of subrecipients, 436 (which included 355 K-12 districts, 48 area centers/consortia, which are housed in 57 buildings, 32 postsecondary institutions, and 1 state-operated institution), were reviewed for the 1988-89 fiscal year. With 20 percent of 436 being only 87, and a total number of 101 subrecipients being reviewed for 1988-89, the Michigan Department of Education (MDE) exceeded its quota by 14 reviews. The desk audit consisted of 83 K-12 districts, 11 area centers/consortia, 6 postsecondary institutions, and 1 state-operated institution. The review represented the fourth year review of the second, five-year cycle.

B. Total Agency-Level Reviews for the Second, Five-Year Cycle

We have completed 424 agency-level reviews during the second, five-year cycle. This number includes 350 K-12 districts, 48 area centers/consortia, 25 postsecondary institutions, and 1 state-operated institution. MDE has also completed a total of 97 percent of the required desk audit reviews for the second, five-year cycle.

C. Desk Audit Procedures

1. Data Analyzed

Data that enumerate and describe vocational education programs which are currently required by and submitted to MDE were examined. This type of audit was designed to identify situations of possible noncompliance such as imbalanced representation of racial/ethnic groups, females/males, and handicapped students enrolled in vocational education programs. The process provided a basis for selecting agencies for on-site reviews to determine if the desk audit findings were the result of discriminatory policies or practices.

The following reports for fiscal year 1987-88 were reviewed to monitor compliance with Title VI, Title IX, and Section 504:

a. VE-4301 (VEDS) - Annual Report of Enrollment and Completion in Vocational Education Programs.

b. SC-4203 - School Summary, Fourth Friday Membership and Personnel Report.

c. Higher Education General Information System (HEGIS).

d. HE-4665 - Academic Year Vocational Education Report.

e. TE-4142 - Register of Professional Personnel.

f. VE-4483-A - Vocational Teacher Fall Report Packet.

g. VO3 - Drop-Out Report by Race, Sex, and High School Enrollments by Grade Levels.

h. VE-4483 Data - Secondary Special Needs Fourth Friday Enrollment.

Two additional data sources were added to ensure a more accurate method of data collection, the VO3 - Drop-Out Report and the VE-4483 Data Report.

2. "Worst-First" and/or Exempted Agencies

Efforts were made to identify the following types of districts:

a. Districts where litigation or conciliation involving legal review or public hearing was pending.

b. Districts which were subjects of complaints for possible discrimination.

c. Districts under court order.

The above district types were identified by information obtained from the Michigan Department of Civil Rights, Attorney General of Michigan, United States Department of Education, Office for Civil Rights--Region V, and MDE/Office of School and Community Affairs.

3. Exclusion Criteria

K-12 districts, area centers/consortia, and post-secondary institutions to which the following criteria applied were excluded from review:

a. Those that were the subjects of pending litigation or under judicial order in Federal or State courts because of alleged discrimination in, or related to, vocational education on the basis of racial/ethnic, gender identity, and handicap.

b. Those that were the subject of pending conciliation involving legal review or public hearing as identified by OCR, or those involved in recent investigations or enforcement proceedings by OCR within the past five years.

The only districts eligible for exclusion were the ones whose litigation, investigation, or other activities involved the vocational education programs of the public agencies in question. Of the districts chosen for desk audits, Allen Park Public Schools was the only district that was eligible for exemption from the review. The United States Department of Education, Office for Civil Rights--Region V, informed us that Allen Park's vocational education program was the subject of a compliance review conducted by their office.

D. Benchmarks

Benchmarks have been established to compare data pertaining to special populations or protected groups as specified in Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, [sic] and Handicap, and are analyzed by the MDE personnel:

1. To identify situations of possible noncompliance indicated by unbalanced representation in vocational education programs.

2. As the basis for selecting sites for further inquiry to determine the accuracy of the agency desk audit.

The following benchmarks were used for the desk audit:

a-1. The percentage of secondary vocational education enrollees by racial/ethnic category as compared to the percentage of students in each racial/ethnic category in the total 9-12 population serviced by the subrecipient.
Data source: VE-4301 and SC 4203

a-2. The percentage of secondary vocational education enrollees by racial/ethnic category as compared to the percentage of secondary vocational education completers in each racial/ethnic category.
Data source: VE-4301

b-1. The percentage of postsecondary vocational education enrollees by racial/ethnic category as compared to the percentage of students in each racial/ethnic category in the postsecondary institution.
Data source: HE-4665 and HEGIS Report

b-2. The percentage of postsecondary vocational education enrollees by racial/ethnic category as compared to the percentage of postsecondary vocational education completers in each racial/ethnic category.
Data source: HE-4665

c-1. The female/male distribution of secondary vocational education enrollees as compared to an assumed 50/50 female/male distribution in the subrecipient's total 9-12 enrollment population.
Data source: VE-4301 and an assumed 50/50 distribution

c-2. The female/male distribution of secondary vocational education completers as compared to the female/male distribution of secondary vocational education enrollees.
Data source: VE-4301

d-1. The female/male distribution of postsecondary vocational education enrollees as compared to the female/male distribution of the total vocational education enrollment for the postsecondary institution.
Data source: VE-4665

d-2. The female/male distribution of postsecondary vocational education completers as compared to the female/male distribution of postsecondary vocational education enrollees.
Data source: VE-4665

e. The number of secondary eligible handicapped students being served in special needs vocational education projects as compared to the subrecipient's total number of handicapped students enrolled in vocational education.
Data source: VE-4483-A and VE-4301

f. The number of postsecondary eligible special needs handicapped students as compared to the subrecipient's total number of handicapped students enrolled in vocational education.
Data source: HE-4665

g. The number of limited English proficient students being served in special needs vocational education projects as compared to the total number of limited English proficient students enrolled in vocational education.
Data source: VE-4483-A

h. The number of secondary disadvantaged students being served by special needs vocational education projects as compared to the total number of disadvantaged students enrolled in the subrecipient's vocational education programs.
Data source: VE-4483-A

i. The number of postsecondary disadvantaged special needs students as compared to the number of disadvantaged students enrolled in postsecondary vocational education.
Data source: HE-4665

j-1. The percentage of vocational education teachers categorized by racial/ethnic category as compared to the racial/ethnic distribution of the vocational education student population.
Data source: VE-4483 and TE-4142

j-2. The percentage of vocational education teachers categorized by sex as compared to the sex distribution of the vocational education enrollment.
Data source: VE-4483 and TE-4142

k. The number of postsecondary limited English proficient special needs students as compared to the number of limited English proficient students enrolled in postsecondary vocational education.
Data source: HE-4665

E. Analysis of Data (Secondary)

For the purpose of data analysis, benchmarks were grouped into three separate categories representing race/ethnic; gender; limited English proficient, disadvantaged and handicapped data. Benchmarks applicable to K-12 districts are a-1, a-2, and j-1 categorized under race/ethnicity; c-1, c-2 and j-2 categorized under gender; and benchmarks e, g, and h under handicapped, limited English proficiency and disadvantaged. Only wage-earning programs were reviewed for benchmarks

requiring data for "completers" (as defined by the Vocational Education Data System).

For each benchmark, the average percentage difference between factors being compared was computed to determine a preliminary score. Then the sums of the preliminary scores for benchmarks a-1 and a-2 were averaged to determine a single categorical score for race/ethnic data. The sums of the preliminary scores for benchmarks c-1 and c-2 were averaged to determine a single categorical score for gender data. Benchmarks e, g, h, j-1, and j-2 were considered as part of the on-site review when applicable.

The single categorical scores for race/ethnic and gender data were added and the average computed to determine a single composite score or measure of possible deviation and ranked from highest to lowest for use in the selection of participants for on-site reviews. Agencies visited on-site in the first, five-year cycle and in the first, second, and third years of the second cycle were deleted from the list. The first 23 districts, and 3 area centers/consortia with the highest single composite scores were reviewed on-site to determine the accuracy of the findings of the agency desk audits.

In order to achieve selection of 25 percent of the agencies for on-site reviews, agencies with the highest single composite scores were selected in the following categories in priority order: 1) wage-earning vocational education enrollments of over 125; and 2) consumer home economics enrollments of over 125. (Many agencies operate both wage-earning and consumer home economics programs.)

F. Analysis of Data (Postsecondary)

For the purpose of data analysis, benchmarks were grouped into three separate categories representing race/ethnic, gender; handicapped, disadvantaged, and limited English proficient data. Benchmarks applicable to postsecondary institutions were b-1 and b-2 categorized under race/ethnicity; d-1 and d-2 categorized under gender; f, i, and k categorized under handicapped, disadvantaged and limited English proficiency. For each benchmark, the percentage difference between factors being compared was computed to determine a preliminary score.

The sums of the preliminary scores for benchmarks b-1 and b-2 were averaged to determine a single categorical score for race/ethnic data. The sums of the preliminary scores for benchmarks d-1 and d-2 were averaged to determine a single categorical score for gender data. Benchmarks f, i, and k were considered as part of the on-site review when applicable.

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Each postsecondary institution's single categorical score for race/ethnic and gender data was added and the average computed to determine a single composite score or measure of possible deviation and ranked from highest to lowest for use in the selection of participants for on-site reviews. The first two community colleges with the highest single composite scores and the one state-operated institution were reviewed on-site to determine the accuracy of the findings of the agency desk audits.

G. Results of the Desk Audit Reviews

Reports summarizing the findings of the agency desk audits were sent to all participants. Included in the participants' reports were tables illustrating the subrecipients' data for each applicable benchmark. Tables for benchmarks a-1, c-1, h, j-1, and j-2 were presented in sets of two in order to illustrate the separate treatment of consumer home economics program data. Complete desk audit reports have been filed and are available for review.

The cover letters that accompanied the desk audit reports offered technical assistance. The assistance was offered from both the MDE OCR Consultant and CRW Associates' staff.

There were no changes in the procedures used for the analysis of data and the conducting of the desk audits.

Clear and present violations were not found as a result of the desk audit reviews; therefore, no corrective actions were necessary at this level of the review process.

V. IDENTIFICATION OF SUBRECIPIENTS FOR ON-SITE REVIEWS

A. Methodology - Selection Process

The compiled results of the 1988-89 agency desk audits were used to select participants for on-site reviews. From each category, wage-earning and consumer home economics, a minimum of 25 percent was selected for on-site reviews. The chosen participants were the agencies receiving the highest composite scores. The total number represented 28 agencies, including 22 K-12 districts, 3 area centers/consortia, 2 postsecondary institutions, and 1 state-operated institution. There were no changes in the method of selecting the subrecipients for on-site reviews.

The selected agencies were notified in the cover letter that accompanied the desk audit findings. The dates of the pending on-site visits were included in the cover letters.

B. Pre-Visit Activities

Prior to each visit, the "on-site coordinator," a person designated by each participant to coordinate activities for the review, received an "On-Site Review Coordinator's Manual" which explained the preparations to be made regarding types of materials, data, and scheduling needed for the review.

C. On-Site Activities

On-site reviews were scheduled between September 1988 and January 1989. Normally visits have been completed by December of each year. However, two institutions were not visited until January, Gwinn Area Community Schools and STIRC. Gwinn was originally scheduled to be visited on October 6, 1988, but suspension of the district's superintendent prompted us to visit Gwinn on January 10, 1989. STIRC, consequently, was not visited until January 17, 1989, which allowed additional time for MDE staff to meet with administrators of STIRC to ascertain information about STIRC's operations and to develop an adequate method of auditing STIRC, an entirely different type of institution from the regular educational agencies in the state of Michigan.

Teams of two or three monitors for secondary and four or five monitors for postsecondary, which included members of CRW Associates, the V-TES staff, and the HEMS staff, were trained to review participants on-site. Each on-site review lasted for a one or two-day period based on the size of the local agency and/or complexity of the review.

D. Report of On-Site Reviews

Final reports of the on-site reviews, specifying items of noncompliance and recommendations, have been submitted to the chief administrative officer and designees of all participating districts. All agencies have been audited at least once previously, and many have been visited on-site.

Within this five-year cycle 110 on-site reviews have been conducted. This represents 25 percent of the total number of subrecipients (436) that were eligible for review.

E. Results of On-Site Reviews

Findings of the on-site reviews were presented in three parts. Procedural requirements of the supplementing regulations, such as assurances, adoption of policies of nondiscrimination, dissemination of policies of nondiscrimination, designation of specific employee, adoption and publication of grievance procedures, self-evaluation, etc., were addressed in the first part. The second and third parts addressed the requirements of the Civil Rights Guidelines and findings of the agency desk audit respectively.

Each On-Site Review Report summarized the findings of the review and the recommendations for compliance including compliance plan development, if necessary.

F. Submission and Monitoring of Compliance Plans

Following the issuance of the On-Site Review Reports, subrecipients were given a maximum of 120 days to submit voluntary compliance plans to MDE. Local agencies were instructed to send first drafts of the compliance plans to CRW Associates for review and for tentative approval by V-TES. A staff workshop (inservice) was given to both the V-TES staff and CRW Associates' staff to review the on-site review procedures. A CRW Associates' staff member was designated as compliance plan monitor for each participating district, area center/consortium, post-secondary institution and the state-operated institution.

Each plan was reviewed by the CRW Associates' staff to determine whether it was acceptable as presented or required modification based on procedures outlined in "Directions for Developing a Voluntary Compliance Plan."

Following the reviews and upon recommendation of the CRW Compliance Plan monitor, letters of tentative approval were issued by MDE. Included in the letters were the concerns, recommendations, and timelines pertinent to final approval of the plans. A form for local board certification was also attached to each tentative approval letter.

After final approval was issued, the compliance plans were reviewed again by the monitor to identify technical assistance needs and to determine probable dates for checking with the agencies to document the implementation of compliance activities. Letters acknowledging the receipt and/or adequacy of items collected and/or reviewed were sent to all participants. If needed, letters which requested overdue documentation were sent to assure timely submission of documents.

Approvals of compliance plans for all participants of 1980-81, 1981-82, 1982-83, 1983-84, 1984-85, 1985-86, 1986-87, and 1987-88 have been issued. Approvals have been issued for fifteen participants of 1988-89.

The following number of compliance plans have been brought to closure for each fiscal year: 25 for 1985-86, 27 for 1986-87 (four plans were required for Southwest Macomb Area Vocational Consortium), 12 for 1987-88 (two fiscal agents did not need to submit compliance plans), and 0 for 1988-89 (however, nine fiscal agents did not need to submit compliance plans for 1988-89).

Letters documenting complete implementation of the voluntary compliance plans have been issued for all districts that have complied.

VI. TECHNICAL ASSISTANCE ACTIVITIES

The Special Populations Programs and Services Unit of V-TES with assistance from CRW Associates was and continues to be primarily responsible for the development and coordination of technical assistance for Civil Rights Compliance in vocational education. In preparation for this monitoring program, the total staff of V-TES, the Community College Services Unit of HEMS, and field personnel have been inserviced to familiarize them with pertinent concepts and components. Special inservice sessions for CRW Associates' staff, held annually, are designated to assist with specific program activities, such as analyzing data, reviewing documents and materials, conducting interviews, reporting findings, etc.

Seven inservice sessions, including four regional workshops, were conducted by the V-TES and CRW Associates' staff for educational agency personnel and the staffs of V-TES and CRW Associates. Technical assistance was also provided in the form of 236 telephone calls, 300 items of correspondence, and 6 meetings to provide technical assistance.

VII. SUBRECIPIENTS REFERRED TO THE OFFICE FOR CIVIL RIGHTS

There were no subrecipients unwilling to negotiate voluntary compliance plans. Likewise, there were no subrecipients referred to OCR for failure to negotiate and/or implement voluntary compliance plans.

VIII. MONITORING ACTIVITIES

The OCR Consultant was and continues to be responsible for monitoring all of the OCR activities which includes: the

monitoring of the activities provided by CRW Associates, the timely completion of all on-site reviews, compliance plan submittals, and compliance plan closures.

During the 1988-89 fiscal year, 35 compliance plans were tentatively approved; 36 compliance plans received final approval; 37 compliance plans were brought to closure, and 9 fiscal agents were not required to submit compliance plans. (Nine fiscal agents either did not have any findings, or cleared up minor findings prior to the deadline for compliance plan submission; and, therefore, negated the need for submittal of compliance plans.) A total of 64 compliance plans were brought to closure; and files, consequently, were closed on 73 total fiscal agents during the second, five-year cycle.